

Before the
Federal Communications Commission
Washington, D.C. 20554

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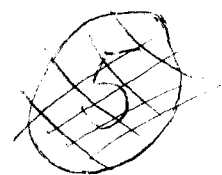
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Administration of the)
North American Numbering Plan)
Carrier Identification Codes (CICs))
)
Petition for Rulemaking of)
VarTec Telecom., Inc.)

CC Docket No. 92-237



Comments of LDI on CompTel Petition for Reconsideration

Long Distance International ("LDI"), by its attorneys, files these comments in support of the "Petition for Reconsideration" filed by CompTel in the above-referenced proceeding.¹ On reconsideration of the Second R&O,² CompTel requests that the Commission extend the deadline for conversion of three digit Carrier Identification Codes ("CICs") to four-digit CICs from January 1, 1998 to January 1, 2000. As explained below, LDI supports an extension of the permissive dialing period because it will provide the time necessary for incumbent local exchange carriers to convert switch hardware and software, and it offers the long distance industry the time necessary to educate their customers once the switch conversion is completed.

¹ The Competitive Telecommunications Association, "Petition for Reconsideration," CC Dkt. No. 92-237 (filed May 19, 1997) (the "CompTel Petition").

² Administration of the North American Numbering Plan Carrier Identification Codes, Second Report and Order, CC Dkt. No. 92-237, 62 Fed. Reg. 19056 (Apr. 18, 1997) ("Second R&O").

LDI is directly and significantly affected by the industry's transition to four digit CICs and seven digit Carrier Access Codes ("CACs") and by the Commission's plan adopted in the Second R&O. For the past two and one-half years, LDI has operated throughout the United States as a switchless reseller of long distance services. A significant portion of LDI's revenues are derived through the competitive offering of casual calling services using LDI's assigned CAC "10799." LDI has built a considerable amount of goodwill with callers using the LDI CAC, and the transition from five digit to seven digit CACs will undoubtedly require time and expense for LDI to re-educate its customers. A CIC transition plan that causes LDI and other carriers to be excluded from "dial around" customers in certain markets, or that provides for an inadequate period of customer education, poses a serious impediment to LDI's ability to compete.

LDI is troubled by the apparent lack of preparedness on the part of many incumbent LECs to meet the January 1, 1998 four-digit CIC conversion deadline. According to CompTel, "[n]umerous ILECs, especially small ILECs in rural and suburban areas, have not reprogrammed or upgraded their equipment in order to accept seven digit CACs." CompTel Petition at 6. CompTel also cites examples of some large LECs -- GTE and Ameritech -- that have not yet fully converted their switching offices. *Id.* at n.6. In its reconsideration petition, Telco Communications Group, Inc. also offers corroborating evidence: "Telco's meetings with independent local exchange carriers indicate that all LECs will not be in a position to reliably handle the new CACs by the end of this year."³

If the incumbent LECs cannot provide assurance to the Commission and to the industry that *all* of their approximately 1400 switching offices have been converted to accept four-digit CICs, the January 1, 1998 transition deadline should be extended. Both the competitive long-

³ Petition for Reconsideration of Telco Communications Group, Inc., CC Dkt. No. 92-237, at 4 (filed May 19, 1997).

distance providers and their consumers will undoubtedly suffer unless the Commission recognizes that all switches must be converted prior to the time that carriers and customers are forced to use four-digit CICs. Without complete conversion in every LEC switching office, competitive long-distance resellers like LDI stand to lose significant business in those markets served by unconverted switches because "dial around" would be rendered impossible. Likewise, consumers who cannot "dial-around" the PIC are effectively left stranded without the ability to make competitive choices among long-distance providers. These consequences are plainly contrary to the Commission's long-standing policy to regulate CICs for the purpose of "foster[ing] competition in interstate telecommunications."⁴

LDI supports the CompTel Petition because it calls for the four-digit CIC transition to take effect in a manner that is prompt, but not so precipitous that it unfairly disadvantages consumers and competitive long-distance providers. LDI agrees with Comptel and Telco Group that, once all switches have been initially converted, there must be an adequate time of testing to ensure that conversion has been successfully implemented. In addition, after the incumbent LEC switches have been fully converted, the long-distance industry must educate the consumer on the new seven-digit CAC and his/her ability to retain the same competitive choices that he/she enjoys today. LDI believes that the transition end-date of January 1, 2000, as initially proposed by the Commission, provides an adequate transition time. By contrast, the current transition deadline, which looms just six months away, is totally inappropriate if there is no assurance that the incumbent LECs have converted switches to accept four-digit CICs.

⁴ Second R&O at ¶ 2, n. 3.

For these reasons, LDI supports the Comptel Petition and asks that the Commission defer the conversion to four-digit CICs until January 1, 2000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark J. O'Connor", is written over a horizontal line.

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Date: June 3, 1997

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of June, 1997, a copy of the foregoing "Comments of LDI on CompTel Petition for Reconsideration" was mailed, postage prepaid, to the following:

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